

-FILED-

APR 30 2021

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

At  
ROBERT M. KOVACH, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your answers.

Darlene Reed  
[You are the **PLAINTIFF**, print your full name on this line.]

v.

United States Post Office  
[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

2:21CV 152

Case Number  
[For a new case in this court, leave blank.  
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

CIVIL COMPLAINT

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] United States Post Office	Headquarters PCC. 475 L'Enfant Plaza SW Washington DC, 20260
2	[Put the names of any other defendants in these boxes.]	
3		

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]

1. How many defendants are you suing? 1
2. What is your address? 4605 Massachusetts Gary Indiana 46409
3. What is your telephone number: (312 ) 219-7840
4. Have you ever sued anyone for these exact same claims?
- ☒ No.
- ☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).
- [DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

## CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

1. See Attachments

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

Claims and Facts (continued)

See Attachment

PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

RELIEF – If you win this case, what do you want the court to order the defendant to do?

As of 04/30/2021 I am asking to be awarded for "Back Pay of Wages" and Damages

I am asking for \$8,000 in Wages and \$50,000 in damages. My rights under FCRA was willingly Violated. I have been suffering from lack of sleep, harassment, embarrassment, stress and my documents being shared with other employees without my consent. In total, I am asking to be awarded \$58,000

FILING FEE – Are you paying the filing fee?

☐ Yes, I am paying the \$402.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. *[If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]*

☒ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

DX I will keep a copy of this complaint for my records.

DX I will promptly notify the court of any change of address.

DX I declare **under penalty of perjury** that the statements in this complaint are true.

Signature

Date

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]



## CLAIMS and FACTS

### Fair Credit Reporting Act Violations

1. I worked for the USPS from 11/07/2020 - 01/22/2021. My job title was PSE Mail Processing clerk as noted on Document 1 (PS Form 50). On 01/17/2021, I was told that I was being terminated due to "lack of work". My last day working for the Post office was 01/22/2021.
  2. On 01/17/2021, all clerks had a meeting regarding the "lay offs due to lack of work". During that meeting, we were instructed to start applying at different facilities for available work. On 01/17/2021, after leaving work, I applied to many job opening with the USPS. On 01/19/2021 we had another meeting confirming that 01/22/2021 would be the last day of work.
  3. On 01/22/2021 I received a job offer a PSE Distributions Associate within the USPS in Pershing Indiana (Document 1). I received this offer while completing my last day of work at the Gary Indiana Plant around 2:30pm. I accepted the offer, and was invited to complete my application and fingerprinting. However, on 01/22/2021 I received an email stating that my offer was rescinded and I would not be consider for any other vacancies within the USPS.
    - (Document 2) On 01/22/2021 at 11:43pm I received an email from USPS stating "I could no longer work for the USPS" due to a pending misdemeanor criminal charge from 2018. The email stated, "That I could NEVER work for USPS again". The email had no header, no contact name, phone number or signature. On 01/25/2021, I called the Plant manager (Dapo Oladeji). I told Dapo that 1 of the supervisors, removed my application from all the "Pre Hire" lists, and the someone sent me a bogus email stating that I was terminated. The Plant Manager at Gary Indiana Plant told me that, the district fired me. I told Dapo that my rights under FCRA have been violated. I then called and email many people within the district, but no one could give me answers.
    - On 01/25/2021 I received a Priority Letter from USPS. The letter was sat by my door (Document 3, 4, 5). The document was from NACI. The letter was generic and did not give a job description nor a signature. The letter came directly after the email on 01/22/2021. The letter stated that did not meet the "Security Requirements for the position (the position was not my listed in the letter). On 02/26/2021 I contacted NACI. I spoke with Keyoundra Lucas. Keyondra confirmed the letter being sent to me. I told her the letter was sent after I was fired on 01/22/2021. I filed an EEO complaint and I told the steward about my concerns.
    - On 02/13/2021 Teresa Zakzewski (My Supervisor) reached out to me. She asked about me not returning to the Gary Plant. I told Teresa what happened. Teresa asked me to send her the email that I received on 01/22/2021. I sent the email to Teresa. Minutes later, Teresa called me back on 02/13/202. During the call she mention that she should the email to another co-worker Joyniesha. Teresa concluded that I received the email on 01/22/2021 because I "Lied" about my background on my application. But yet, Teresa also sent an email to Tonychia Clark (Human Resource Management Official) (Document 4). On 02/15/2021, I called Tonychia Clark asking
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CLAIMS AND FACTS

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why I was fired and who sent me that email. Tonychia stated that (Management did not want me working at the Gary Plant)

- 2/2021 I filed and EEO compliant and I spoke with the Steward at the Gary Indiana Plant. I was invited to a REDRESS on 04/28/2021 regarding the EEO Complaint. During the meeting, Sheldon (USPS Attorney) stated that my rights under FCRA were not violated and that the USPS "HAD NOT" done anything wrong out of the ordinary. In addition, he stated that my claim would be dismissed in court.
4. The United States Post Office rescinded my job offer without given me a "Pre Notice". I was not given a "Pre Adverse Notice" nor a verbal warning before 01/22/2021. My FCRA rights were violated. USPS promised to follow the laws pertaining to FCRA. My first contact with the USPS regarding my criminal background was on 01/22/2021 at 11:43 pm.

The USPS did not perform a criminal background check on me, they contract another party to perform the background check.

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